

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION NO. C-1-00-637
v.	)	
	)	
DANIEL GREEN, L.W.G. CO.,	)	
INC. f/k/a GREEN INDUSTRIES	)	Judge Susan J. Dlott
INC., THE ESTATE OF MAURICE GREEN	)	
and DANIEL GREEN IN HIS CAPACITY AS	)	
THE PERSONAL REPRESENTATIVE OF THE	)	
ESTATE OF MAURICE GREEN,	)	
	)	
Defendants	)	
and	)	
	)	
SAUNDRA GREEN, wife of	)	
DEFENDANT DANIEL GREEN,	)	
	)	
Rule 19 Defendant.	)	

\* \* \* \* \*

**RESPONSE IN SUPPORT OF PLAINTIFF'S  
MOTION TO ENTER CONSENT DECREE**

\* \* \* \* \*

Defendant Daniel Green and Third-Party Defendant Sandra Green submit this response in support of Plaintiff's May 4, 2006 Motion to Enter Consent Decree. Defendants support entry of the Consent Decree lodged on January 11, 2006 on the grounds that the Consent Decree is fair, reasonable and consistent with the purposes of Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. §§ 9601 et seq.

Respectfully submitted,

/s/ David A. Owen

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-AND-

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COUNSEL FOR DEFENDANT  
DANIEL GREEN AND THIRD-PARTY  
DEFENDANT SAUNDRA GREEN

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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on this 12<sup>th</sup> day of May, 2006.

/s/ David A. Owen  
COUNSEL FOR DEFENDANT  
AND THIRD-PARTY DEFENDANT